

AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A SEARCH WARRANT

I, Jarod Brown, a Special Agent with the Federal Bureau of Investigation (FBI), being duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the Federal Bureau of Investigation's (FBI). I have been a Special Agent with the FBI since August 2007 assigned to the Sierra Vista Residence agency since August 2021. I have experience with violent crimes, white collar and national security investigations, including, but not limited to, terrorism cases, search warrants, physical surveillance, evidence collection, and arrests.

2. I am, along with numerous other detectives and agents, investigating the transportation of a 12-year-old female from her residence in Safford, Arizona to Hilton Head, South Carolina with intent to engage in criminal sexual activity with the child. As shown below, there is probable cause to believe the requested information is material to the investigation of the unknown assailant, in violation of Title 18 U.S.C. § 2423(a), Transportation of a Minor with Intent to Engage in Criminal Sexual Activity.

3. I make this affidavit in support of an application for search warrant for samples of Deoxyribonucleic Acid ("DNA"), which are to be obtained via buccal, or cheek, swab and hair from his head and pubic area from TIMOTHY MIKELL SCHULTHEIS aka JACKSON ODEN, who is described in more detail in Attachment A. The items to be seized as evidence of violation Title 18, United States Code, Section 2241 are: Four (4)

buccal oral swabbings and hair from head and pubic area taken from, TIMOTHY MIKELL SCHULTHEIS, date of birth 04/01/1998.

4. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents, law enforcement officers, and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

PROBABLE CAUSE

5. During the evening of March 20, 2022, a man reported his 12-year-old daughter (hereinafter referred to as “Jane Doe”) was missing after she had gone for a walk at approximately 11:00 AM near their residence in Safford, Arizona and did not return home. Jane Doe had no contact with her family after leaving the residence that morning. A tablet belonging to Jane Doe revealed several social media accounts used by the child to include Facebook, Instagram, and Snapchat. Information obtained from Jane Doe’s Facebook account revealed communications between Jane Doe and a username of Jackson Oden. The communications revealed a plan for Oden to travel 27 hours to meet with Jane Doe on March 20, 2022, in Arizona.

6. On March 24, 2022, Jane Doe’s father provided written consent for law enforcement to search the tablet. On March 26, 2022, Graham County (Arizona) Sheriff’s Office obtained a search warrant signed by the Justice of the Peace Gary Griffith for the contents of Jane Doe’s Facebook account. Jane Doe’s Facebook account contained chat communications between Jane Doe and Oden dated between March 18, 2022 and March

19, 2022. The results for the Facebook warrant included pictures Oden sent to Jane Doe of himself, clothed except for one picture in which Oden was shirtless. The communications revealed the nature of the relationship was sexual and Oden planned to participate in sexual intercourse with the minor.

7. FBI requested an emergency disclosure of the location data pertaining to Jackson Oden's Facebook account. The data returned by Facebook regarding the Jackson Oden account included a phone number which resolved back to Timothy Schultheis. Further investigation confirmed the photographs sent to Jane Doe by Jackson Oden depict Timothy Schultheis, as matched to his South Carolina driver's license and previous booking photos.

8. The follow are excerpts of the communications between Schultheis and Jane Doe which took place over Facebook:

Schultheis: "Hey baby you look absolutely gorgeous my name is Jack it's nice to meet you sweetheart" (3/18/2022 10:40 PM UTC)

Jane Doe: "Ummm hey." (3/18/2022 10:42 PM UTC)

Jane Doe: "And ummm nice to meet you too." (3/18/2022 10:56 PM UTC)

Jane Doe: "My name is [Jane Doe]." (3/18/2022 10:56 PM UTC)

Schultheis: "Im just gonna be strait with cuz I suck at small talk. Im looking for someone that I can grow and have fun with, someone I can go on adventures and be myself with. Someone I can get to know and someone I can take care of. Plus

someone that I can leave shaking in the bedroom. I'm not trying to be too forward I just like to be honest with ppl I talk to." (3/18/2022 11:02 UTC)

Jane Doe: "Oh ok." (3/18/2022 11:07 PM UTC)

Jane Doe: "And does age matter to you? Im just curious." (3/18/2022 11:02 PM UTC)

Schultheis: "I mean I don't want to get arrested if I come see you obviously. How old are you, I'm 23." (3/18/2022 11:13 PM UTC)

Jane Doe: "I'm 12 years old." (3/18/2022 11:13 PM UTC)

Schultheis: "Yeah I don't think your mom and dad would be too happy about me showing up." (3/18/2022 11:14 PM UTC)

Jane Doe: "Yeah." (3/18/2022 11:15 PM UTC)

Jane Doe: "And I'm not sure if you live in safford Arizona." (3/18/2022 11:15 PM UTC)

Schultheis: "I don't, thing is I could sneak you if your can get out with a go bag. Only bad part is if they have cameras." (3/18/2022 11:16 PM UTC)

Jane Doe: "No my dad don't have cameras." (3/19/2022 2:40 AM UTC)

Jane Doe: "I don't live with both of my parents." (3/19/2022 2:41 AM UTC)

Jane Doe: "I only live with my dad." (3/19/2022 2:41 AM UTC)

Schultheis: "Would you be willing to sneak out and meet me?" (3/19/2022 2:41 AM UTC)

Jane Doe: “Mmmmsure but r u really gonna come to safford Arizona???”

(3/19/2022 2:42 AM UTC)

Schultheis: “Tbh I got family in mesa and I’ve made that kinda drive before.”

(3/19/2022 2:42 AM UTC)

Schultheis: “Do you have an address for me?” (3/19/2022 2:42 AM UTC)

Jane Doe: “Yep.” (3/19/2022 2:42 AM UTC)

Schultheis: “Send it.” (3/19/2022 2:42 AM UTC)

Jane Doe: “Wait do you have Snapchat?” (3/19/2022 2:42 AM UTC)

Schultheis: “Yeah what’s yours I’ll add you.” (3/19/2022 2:43 AM UTC)

Jane Doe sent a photograph of her Snapchat account. (3/19/2022 2:43 AM UTC)

Schultheis: “Added.” (3/19/2022 2:44 AM UTC)

Schultheis: “Send me that address on snap I need to see how long it’ll be.”

(3/19/2022 2:48 AM UTC)

Jane Doe: “Kk.” (3/19/2022 2:48 AM UTC)

Jane Doe: “Hey I have. Question.” (3/19/2022 3:11 AM UTC)

Schultheis: “What’s up baby.” (3/19/2022 3:11 AM UTC)

Jane Doe: “R u gonna get to know me and then have sex with me or something.”

(3/19/2022 3:12 AM UTC)

Jane Doe: “How long are you going to keep me?” (3/19/2022 3:11 AM UTC)

Schultheis: “as long as you want to stay. I’m not forcing you to do anything but yeah

I want to fuck you.” (3/19/2022 3:12 AM UTC)

9. Schultheis and Jane Doe continue coordinating via Facebook and Snapchat the specifics of the pick-up for date, time, and location.

10. Evidence obtained indicates Schultheis picked up Jane Doe on March 20, 2022. Schultheis was driving a 2012 Honda Civic bearing a South Carolina license plate 284NE and registered in his name. This vehicle was observed in Texas westbound on Interstate 10 at approximately 6:01 AM MST on March 20, 2022, and again eastbound in Texas on Interstate 10 at approximately 7:59 PM CST on March 20, 2022.

11. Schultheis was arrested at his apartment in Bluffton, South Carolina on the morning of March 30, 2022. Jane Doe was found in the apartment.

12. Interviews with Jane Doe and Schultheis following his arrest indicate they slept in the same bed while they were in South Carolina. Jane Doe and Schultheis both denied having sexual intercourse however both stated they “cuddled” and had other physical contact.

13. A search of Schultheis apartment following his arrest found a ball gag and whip. These items were collected as evidence as well as clothing and other items possibly containing DNA were collected for analysis.

14. Jane Doe was transported to a medical facility in South Carolina where she was examined and participated in a Sexual Assault Nurse Examination (SANE). DNA was collected during this evaluation.

15. All this evidence was submitted to the FBI Laboratory in Quantico, Virginia for evaluation. Forensic examiners at the Lab have indicated to conduct a thorough

evaluation of the DNA collected, they will need DNA to include buccal swabs and hair from Schultheis's head and his pubic area.

16. Fluids and tissues of the human body such as blood, hair, saliva, and semen contain deoxyribonucleic acid (DNA), which is a chemical substance that serves as the genetic code. Although the DNA code differs from person to person (except for identical twins), the DNA code is the same within all the cells and tissues of a single person. DNA typing techniques commonly used in the forensic DNA laboratory can detect differences in the DNA codes from person to person. DNA typing is a very powerful technique for excluding or including an individual as the source of a biological fluid or tissue. In order to make comparisons of DNA profiles from body fluids associated with evidence materials and the DNA profile possessed by an individual, a sample of body fluid must be obtained from the individual. Because the DNA code is the same within an individual, any body fluid (i.e. blood or saliva) can be used as an exemplar for an individual.

17. Based on the foregoing facts and your affiant's training and experience, your affiant has probable cause and reasonable belief that the information obtained from the requested identifying information will provide evidence aiding in the identification, apprehension, and prosecution of the suspect who committed the aforementioned sexual assault.

REQUEST FOR AUTHORIZATION

18. Based on the foregoing, I request that the Court issue the proposed search warrant authorizing the government to obtain buccal swabs and hair from the person of SCHULTHEIS, more specifically identified in Attachment A.

19. The facts set forth in the previous section show that there are reasonable grounds to believe that the items sought are relevant and material to an ongoing criminal investigation. Specifically, these items will help investigators confirm the identity of the individual who is responsible for the sexual assault.

20. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

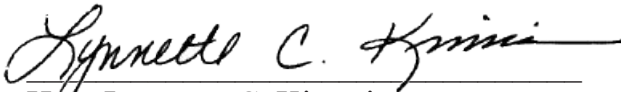
Jarod Brown

Digitally signed by Jarod Brown
Date: 2022.06.21 19:13:30 -07'00'

Special Agent Jarod Brown
Federal Bureau of Investigation

Subscribed and sworn to telephonically

before me this 22nd day of June, 2022.



Hon. Lynnette C. Kimmins
United States Magistrate Judge

22-05858MB

ATTACHMENT A

The person of Timothy Mikell Schultheis aka Jackson Oden, born in 1998, approximately 5 feet 11 inches tall, with brown hair and brown eyes.

22-05858MB

ATTACHMENT B
ITEMS TO BE SEIZED

A DNA standard obtained by inserting four buccal swabs (4) into the mouth of Timothy Mikel Schultheis, for DNA comparison; and hair samples from the head and pubic areas of Timothy Mikel Schultheis, for DNA comparison.